

UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO

IN RE:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,**

as representative of

**THE COMMONWEALTH OF PUERTO
RICO,
et al.,**

**THE EMPLOYEES' RETIREMENT
SYSTEM OF THE GOVERNMENT OF
THE COMMONWEALTH OF
PUERTORICO, AND THE
PUERTO RICO PUBLIC
BUILDINGS AUTHORITY**

Debtors¹

PROMESA TITLE III

**Case No. 17-BK-3283
(LTS)**

**MOTION SUBMITTING EXHIBITS A AND B TO MOTION FILED
BY ADMINISTRATIVE EXPENSE CLAIMANTS PABLO MELANI
CURRA AND DIANA VELEZ MARTINEZ AT ECF NUMBER 22044**

**TO THE HONORABLE UNITED STATES DISTRICT COURT
JUDGE LAURA TAYLOR SWAIN:**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 35(787)66-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

COME NOW, Pablo Melani Curra and Diana Velez Martinez, administrative expense claimants in this Title III proceeding filed by the Commonwealth of Puerto Rico under PROMESA, to respectfully submit Exhibits A and B as referenced in ECF No. 22044.

1. On this date, Pablo Melani Curra and Diana Velez Martinez filed their Reply to the Objection to their Request for Allowance and Payment of Administrative Expense Payments filed by the Debtor at ECF No. 21932.
2. In the Reply, the administrative claimants reference Exhibit A: *Notice Of Injunction Staying The Litigation In This Case And Regarding The Requirement To File An Administrative Expense Claim With The Title III Court* filed by the Department of Justice of the Commonwealth of Puerto Rico.
3. The Reply also references Exhibit B: *The Partial Judgment* issued by the Court of First Instance in the proceeding filed by the appearing administrative expense claimants.
4. Due to inadvertence, the Reply by the administrative claimants at ECF No. 22044 was filed without the referenced Exhibits A and B. Claimants are submitting a Certified Translation of Exhibit A and a Certified Translation of Exhibit B with this Motion.
5. The appearing parties and the undersigned attorney apologize for this inadvertence and oversight, and respectfully request the Court allows the submission of Exhibits A and B as if filed contemporaneously with the Reply at ECF No. 22044.

WHEREFORE, administrative expense claimants Pablo Melani Curra and Diana Velez Martinez respectfully request this Honorable Court grants this motion and allows the submission of Exhibits A and B as if filed contemporaneously with the Reply at ECF No. 22044.

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk of the Bankruptcy Court using the CM/ECF system, which will send electronic notification to all participants in the captioned case.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on September 2, 2022.

Counsel for Pablo Melani Curra and Diana Velez Martinez

s/ *Alexis Fuentes-Hernández, Esq.*
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